Commonwealth of Kentucky
Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

Completed by: Rebecca T. Cash

GENERAL INFORMATION:

Name:	Dana Corporation, Perfect Circle Division
Address:	P.O. Box 486, Franklin, Kentucky 42135-0486
Date application received:	December 9, 1998
SIC/Source description:	3592
AFS Plant ID:	21-213-00009
EIS #:	105-3740-0009
Application log number:	F897
Permit number:	V-99- 025

APPLICATION TYPE/PERMIT ACTIVITY:

[X] Initial issuance
[ ] Permit modification
__Administrative
__Minor
__Significant
[ ] Permit renewal

[ ] General permit
[ ] Conditional major
[X] Title V
[ ] Synthetic minor
[X] Operating
[ ] Construction/operating

COMPLIANCE SUMMARY:

[ ] Source is out of compliance
[X] Compliance certification signed
[ ] Compliance schedule included

APPLICABLE REQUIREMENTS LIST:

[ ] NSR [ ] NSPS [X] SIP
[ ] PSD [ ] NESHAPS [ ] Other

MISCELLANEOUS:

[ ] Acid rain source
[ ] Source subject to 112(r)
[ ] Source applied for federally enforceable emissions cap
[ ] Source provided terms for alternative operating scenarios
[X] Source subject to a MACT standard
[ ] Source requested case-by-case 112(g) or (j) determination
[ ] Application proposes new control technology
[X] Certified by responsible official
[X] Diagrams or drawings included
[ ] Confidential business information (CBI) submitted in application
[ ] Pollution Prevention Measures
[ ] Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM	4.85	5.01
SO_2	0.01	0.01
NOx	1.47	1.47
CO	1.23	1.23
VOC	30.21	30.23
LEAD	0.00	0.00
HAP ≥ 10 tpy (by CAS)		
Trichloroethylene	30.00	30.00

SOURCE PROCESS DESCRIPTION:

Dana Corporation, formerly known as Sealed Power, is currently authorized to operate by O-87-030 (Revision 3). A skeleton application, which met Title V requirements, was received on December 11, 1996 and was determined to be a comprehensive application on December 9, 1998. The application was deemed complete on January 26, 1999. Additional information was requested on March 24, 1999 and received on April 12, 1999.

The facility manufactures iron piston rings. The facility forms the rings in a machining area using lathes, grinders, lappers, and other machining equipment. The emissions from the machining operations are controlled by a baghouse. The rings are then stored until plating is performed. The rings may have a layer of iron oxide formed on the outside surface. This layer is removed with a rust strip process. A Granoseal layer is then applied to the outside diameter of the rings. The rings are then run through a degreaser to remove oil and dirt from the outside of the rings. The rings are plated at either the tinplate line or the seal plate line. The tin plating consists of plating pure tin on iron substrate through a series of tanks. The seal plating consists of plating a mixture of tin and nickel on iron substrate through a series of tanks. After plating, excess moisture is removed from the rings in a drying oven.

A modification to the seal plate line was proposed in order to automate the line. The modification will improve the efficiency and reduce chemical drag-out. A new ventilation system will also be installed for the line and will exit via an emission stack through the roof. The modification will cause insignificant increases to the lines emissions.